

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF CALIFORNIA, et al.,

Plaintiffs,

v.

LINDA MCMAHON, in her official capacity as
Secretary of Education, et al.,

Defendants.

C.A. No. _____

DECLARATION OF ADAM LECKIE

I, Adam Leckie, declare as follows:

1. I am a resident of the State of Arizona. I am over the age of 18 and have personal knowledge of all the facts stated herein based on personal experience or publicly available information. If called as a witness, I could and would testify competently to the matters set forth below.

2. I am currently the Superintendent of Casa Grande Elementary School District. As Superintendent, I have primary oversight of district operations, performance, and budget. I work directly with our finance and grants department to develop a budget which is approved by the governing board each year. The superintendent is intimately knowledgeable about all aspects of core district functions. I work to ensure limited resources are allocated to meet our strategic goals, communicate our progress to key stakeholders, and oversee leaders tasked with improving district outcomes. Financial performance is a critical function of the superintendent's responsibility as a steward of public resources.

3. Casa Grande Elementary School District is comprised of 8 elementary schools, 3 middle schools, 1 C-STEM school (COIL), and 1 early childhood learning center, serving approximately 6,700 students. With approximately 900 employees, the Casa Grande Elementary School District is the second-largest school district in Pinal County and is one of the largest employers in the county. The annual operating budget is over \$50 million.

4. Poverty is a prevalent problem in the District: 76% of our students qualify for free or reduced lunch, and several of our schools have 100% free or reduced lunch. Poverty is highly relevant to the District's ability to effectively serve its students. It's well documented that poverty increases the rates of or is often accompanied by food and housing insecurity, trauma,

abuse, and households lead by single parents. It takes additional resources and supports, using already strained budgets, to educate students facing these demographic realities. These are exactly the sorts of extenuating circumstances that the withheld Title funds are meant to address to mitigate negative impacts on students' ability to get an education.

Anticipated Federal Funds Have Been Withheld from the District

5. Local Education Agencies (LEAs), like the Casa Grande Elementary School District, depend on annual formula funding from the U.S. Department of Education (ED).

6. The funding is statutorily required by the Elementary and Secondary Education Act of 1965 (ESEA), which focuses on equitable access to quality education, especially for disadvantaged students. The law has been reauthorized and amended multiple times and is currently referred to as "ESSA" for the Every Student Succeeds Act that was passed in 2015. ESSA provides the statutory framework for the major federal K-12 programs that Arizona implements.

7. ED awards funding under ESSA based on the statutory titles (e.g. Title I, Title II, Title III etc.). However, certain title program funding appears to be frozen and is being withheld.

8. The frozen funding does not derive from competitive grant programs. Formula funds under ESSA title programs are calculated automatically using specific formulas written into the law and administered by ED. Those formulas are based on population data and targeted need-based factors for each ESSA title program. These funds are then passed from ED to SEAs, which retain some funds to administer the programs. The bulk of the funding is passed to LEAs like the District.

9. As described further below, the withheld funding is provided to ensure that SEAs and LEAs can meet their federal obligations to K-12 students. To remove the funding without removing the obligations and duties of LEAs risks our compliance with laws focused on ensuring that all students succeed.

The Casa Grande Elementary School District Built Its 2025-26 Budgets in Reasonable Anticipation of Receiving ESSA Formula Funds by July 1

10. The annual timeline for availability of ESSA formula funding has historically been predictable and consistent to allow SEAs and LEAs to budget for the upcoming school year. In the spring, Arizona LEAs develop their budgets for the following school year. These budgets include estimated funding from federal formula programs. Based on these budgets, LEAs often begin hiring staff for the following school year in the spring of the preceding school year.

11. Schools districts operate on very tight budgets and spend a lot of time reviewing and setting budgets strategically. Accordingly, by the time the fiscal year starts on July 1, nearly all monies are already encumbered and accounted for. In the District, almost 90% of the main budget goes to pay for personnel, and a similar percentage of grant funds likewise goes towards personnel.

12. Like other Arizona LEAs, the District has already developed budgets for the 2025-26 school year. In developing those budgets, the District's schools were relying on the reasonable belief that ESSA formula funding would be largely level-funded for this year. That funding supports staff, programming, and materials that are necessary to ensure that disadvantaged students have an equal access to education and opportunity.

13. Grant budgets are developed in the same manner during the spring time for the following year. This allows the District to hire personnel and schedule activities for the

upcoming school year. Grants are reviewed and approved by the state department of education, and districts are then able to expend funds. Any disruption in funding amounts needs to be accounted for early in the budget development process to afford districts the ability to shift expenses or eliminate positions for the following school year.

14. In 2024-25, the District received \$ just over \$400,000 of ESSA formula funding to administer the federal programs under ESSA that are now being impacted. This includes:

- a. Title II: \$209,229
- b. Title III: \$67,729
- c. Title IV-A: \$127,967

15. For the upcoming 2025-26 school year, the District expected to receive these funds at a comparable level and it wrote its budgets based on that reasonable expectation according to how this process have played out for many years.

The Casa Grande Elementary School District is Experiencing Immediate Harm and Will Experience Further Harm as a Result of the Formula Funding Freeze

16. As explained below, the withheld Title funding pays for teacher supports and student programs in a variety of critical ways. All of this is at immediate risk because there are no guaranteed funds for July 1, 2025 through September 30, 2026.

17. The purpose of Title II funds is to provide training and support to improve the quality of teaching in Title eligible schools. Funds are intended to build capacity with existing staff through training, coaching, and mentoring of instructional staff. The District uses Title II funds in a number of ways, including to:

- a. Provide educational specialists who work directly with teachers and instructional coaches;
- b. Pay for a Science Coordinator to improve science instruction for students;

- c. Train teachers on high quality instructional practices outside of normal; school hours;
- d. Provide mentors for new teachers to support onboarding and induction; and
- e. Provide access for new teachers to the Arizona New Teacher Leadership Institute

18. The primary purpose of Title III funds is to support English Language Learners, who make up a large number of the District's students. Title III has stringent compliance requirements. In addition, the District has a state law obligation to assist these students in understanding the English language so they can benefit from the rest of their education. To these ends, the District uses Title III funds in a number of ways, including to:

- a. Fund Educational Assistants to support English Language Learners and teachers;
- b. Fund parent engagement nights for families of ELLs;
- c. Funds a District EL Coordinator who works directly with teachers, students, and families; and
- d. Fund training materials and resources for teachers on how to teach ELLs.

19. Title IV funds are also put to a wide variety of uses, acting as a source of support to address needs not covered by other Title funds, such as:

- a. Enriching educational experiences such as summer career camp;
- b. Art and music collaboration through off-contract planning;
- c. Technology training for teachers;
- d. Funding a family liaison who works to support improved attendance;
- e. Training for gifted teachers;

- f. Supporting district-wide STEAM fair and Maker-Showcase events;
- g. Funding art and music supplies;
- h. Field Trips for gifted students; and
- i. Behavioral support training for teachers and other staff.

20. The District depends on all of these Title funds. But the Title IV funds in particular are a critical source of funding for additional resources that make the District's learning environments effective. Higher level of poverty in our District often lead to more school violence and disruptive behavior, requiring additional supports. To call attention to one of those supports listed above, the family liaison helps to build a relationship between the family and school, which is essential to a student's long-term success. The withholding of these funds undermines the District's ability to meet the needs of its students, now and into the future.

21. Even if this funding is eventually released, the short-term impacts now and for the imminent future are extremely disruptive. New educators have already started as of July 1 and since then. Funds have already been allocated that should be in the process of being spent now. Again, schools operating on tight budgets have very few options under these circumstances and no adequate mechanism to simply move funds around in the budget in the meantime.

22. This freeze will have immediate effects of requiring schools to either eliminate existing positions and layoff individuals, move staff to other positions that are currently vacant, or try and offset near term losses with other funds, with no guarantee that those funds will ever be replenished. Disruption to ongoing training will negatively impact teacher development and will force the cancelation of several professional learning events.

23. Without funding the District would be forced to cancel a number of teacher planning sessions, the summer career camp for students, our ELL family engagement nights, and planned field trips for gifted students.

24. Under federal law and regulation, funding under these withheld programs can only be used to supplement (and not replace or supplant) existing programs. If LEAs use state funds to backfill these programs for the 2025-26 school year, they risk creating a supplanting issue in the future if these funds are released in future years.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 10, 2025, at Casa Grande, Arizona



Adam Leckie